1 2 3	GIA N. MARINA Nevada Bar No. 15276 CLARK HILL PLLC 3800 Howard Hughes Drive, Suite 500 Las Vegas, Nevada 89169		
4 5	E-mail: gmarina@clarkhill.com Telephone: (702) 862-8300 Facsimile: (702) 778-9709 Attorney for Defendant		
6	Equifax Information Services LLC		
7			
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
9 10	ROSALINA SHAAKOV,	Case No. 2:22-cv-01834-GMN-DJA	
11	Plaintiff,		
12	vs.	JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT EQUIFAX	
13	EQUIFAX INFORMATION SERVICES, LLC,	INFORMATION SERVICES LLC TO FILE ANSWER	
14	FREEDOM FINANCIAL ASSET MANAGEMENT LLC DBA FREEDOM)		
15	PLUS and CLARK COUNTY CREDIT UNION,	SECOND REQUEST	
16)		
17	Defendants.		
18			
19	Defendant Equifax Information Services LLC ("Equifax") has requested an extension of		
20	time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has		
21	no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED		
22	to by and among counsel, that Defendant Equifax Information Services LLC's time to answer,		
23	move or otherwise respond to the Complaint in this action is extended from December 27, 2022		
24	through and including January 26, 2023 . The request was made by Equifax so that the parties may		
25	have		
26	//		
27	//		
28	//		

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1	additional time to engage in settlement discussion, and Plaintiff approves. This stipulation is filed		
2	in good faith and not intended to cause delay.		
3	Respectfully submitted, this 22 nd day of December, 2022.		
4			
5	CLARK HILL PLLC	Services LLC	
6	By: <u>/s/Gia N. Marina</u>	No opposition	
7	Gia N. Marina	/s/ Michael Kind	
8	Nevada Bar No. 15276 3800 Howard Hughes Pkwy,	Michael Kind, Esq. Nevada Bar No. 13903	
	Suite 500	KIND LAW	
9	Las Vegas, NV 89169	8860 South Maryland Parkway, Suite 106	
10	Tel: (702) 862-8300 Fax: (702) 778-9709	Las Vegas, NV 89123	
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	Attorno an for Defendant Emifer Information	Email: mk@kindlaw.com	
12	Attorney for Defendant Equifax Information	George Haines, Esq.	
13		Nevada Bar No. 9411	
14		Gerardo Avalos, Esq.	
		Nevada Bar No. 15171	
15		HAINES & KRIEGER, LLC 8985 S. Eastern Ave., Suite 350	
16		Henderson, NV 89123	
17		Phone: (702) 880-5554	
17		Fax: (702) 385-5518	
18		Email: ghaines@freedomlegalteam.com Email: gavalos@freedomlegalteam.com	
19		Attorneys for Plaintiff	
20		Autorneys for 1 tunning	
21			
22	IT IS SO ORDERED:		
23	1000		
24	United States Magistrate Judge		
25	DATED:12/28/2022		
26			
27			
28			

CERTIFICATE OF SERVICE I hereby certify that a true and exact copy of the foregoing has been served this 22nd day of December, 2022, via CM/ECF, upon all counsel of record: By: /s/ Gia N. Marina Gia N. Marina Nevada Bar No. 15276 3800 Howard Hughes Pkwy, Suite 500 Las Vegas, NV 89169 Tel: (702) 862-8300 Fax: (702) 778-9709 Email: gmarina@clarkhill.com